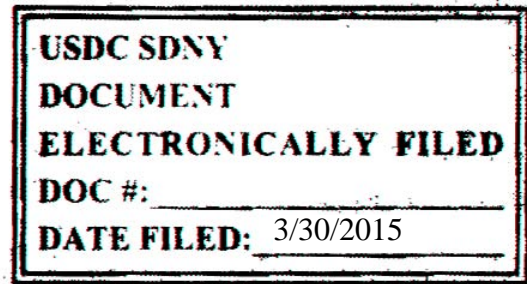




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March 27, 2015

Via ECF

The Hon. Sarah Netburn
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *The Export-Import Bank of the Republic of China v. République du Niger*, 97 CIV 3090
(LAK)

Dear Judge Netburn:

We represent judgment creditor The Export-Import Bank of the Republic of China ("Ex-Im Bank"). We write to request that the Court stay its March 19, 2015 order (the "Order"), granting in part and denying in part Ex-Im Bank's motion to compel and for sanctions, and all deadlines for submissions to the Court set forth in the Order.

On March 18, 2015, we received a letter from Christopher Swart, Esq., of the London and Singapore law firm Holman Fenwick Willan, informing us that his firm has been retained by judgment debtor République du Niger ("Niger") for the purpose of entering into settlement discussions with Ex-Im Bank. Since then, we have had further communications with Mr. Swart. (Holman Fenwick has no United States office; and, so far as we know, Niger has not retained counsel yet to appear in this matter).

Ex-Im Bank believes that Niger is now prepared to enter into settlement discussions, and is hopeful that those discussions may result in the resolution of the matter. The parties have tentatively agreed that settlement discussions will take place sometime in the second half of April, over a three day period.

To facilitate the parties' settlement discussions, Ex-Im Bank has agreed to suspend much of its judgment enforcement effort against Niger, including any discovery efforts against Niger, while the settlement discussions are ongoing.

Therefore, we respectfully request that the Court stay the Order until May 1, 2015.¹ Ex-Im Bank proposes that, two days before the expiration of the stay, on April 29, 2015, it submit a

¹ Contemporaneously with this letter, Ex-Im Bank has submitted a letter to the Honorable Lewis A. Kaplan, United States District Judge, requesting that he stay the time period under Federal Rule of Civil Procedure 72(a) for Niger

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status report to the Court as to the progress of the settlement discussions, and the need for any further stay.

We are available to address any questions that the Court may have on the matter either in person, by telephone, or by letter.

Respectfully submitted,

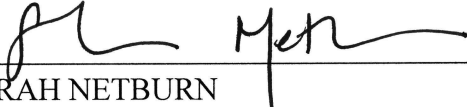
/s/ Paul E. Summit

Paul E. Summit

cc: Christopher Swart, Esq.

The Court's March 19, 2015 Order is STAYED until April 29, 2015. The Court also stays the time for the judgment debtor to object to that Order until 14 days from April 29, 2015. Absent compelling grounds, the Court will not grant a further extension of this deadline. Mr. Summit will serve a copy of this Order upon Mr. Swart.

SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

New York, New York

March 30, 2015

to serve and file objections to the Order. Any objections would be served and filed within 14 days after the stay of the Order (if granted) is lifted. A copy of the letter to Judge Kaplan is attached as Exhibit A.